

ALMONT SHIPPING TERMINALS



DEPARTMENT OF TRANSPORTATION

98 DEC 28 PM 3:46

DOCKET SECTION

49078

December 23, 1998

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street SW.,
Washington, DC 20590-0001

USCG-98-4302-3

Re: Almont Shipping Terminals, Wilmington, NC
USCG-1998-4302 comments

Dear Sir or Madam:

Almont Shipping Terminals (Almont) supports the proposed changes to the dangerous cargo rule, 33 CFR § 126 (rule). These changes will eliminate the inappropriate and hazardous application of **aisleway** requirements to dry bulk storage facilities.

Almont is a marine terminal that handles dry bulk materials. The terminal includes multiple warehouses, two of which are "designated waterfront facilities" under § 126.05 in that Almont is authorized to handle "dangerous cargo".

These warehouses have been the subject of discussions with the Coast Guard and other authorities regarding the arrangement of bulk products in light of Section 126.15(m) of the current rule. This section imposes a number of material arrangement standards on waterfront facilities such as Almont's. The standards include, among other things:

(m) Arrangement of cargo, freight, merchandise or material. That cargo, freight, merchandise or material is arranged on the waterfront facility according to the individual structure of such facility, in a manner to permit complete access for the purpose of fire extinguishment; that, except on facilities used primarily for the transfer of railroad or highway vehicles to or from cargo vessels and carfloats; cargo, freight, merchandise or other material is placed on the waterfront facility in accordance with the following:

(1) At least two feet of clear and open space shall be maintained free of rubbish, **dunnage**, or other obstructions between cargo, freight, merchandise, or other material piles and both sides of the walls of the waterfront facility, firewalls or fire stops in enclosed waterfront facilities. This distance shall be measured from the most prominent projection of the wall such as studding, **bracings**, or other obstructions that are part of the structure. In an unenclosed facility, 2 feet of clear and open space shall be maintained free of rubbish, **dunnage**, or other obstructions between cargo, freight, merchandise or other materials and the sides of the pier.

*

(5) A main aisle of at least twenty feet in width shall be maintained the entire length of the waterfront facility if control of fire requires trucks to come on the pier. The aisle may be reduced to eight feet in width if such access by fire trucks is not required.

(6) Cross aisles, at least five (5) feet wide and straight shall be maintained at intervals not exceeding seventy-five (75) feet, and extending to the side of the waterfront facility.

As indicated in the underscored text, the purpose of the aisleway Requirements is to permit access to storage areas for fire extinguishment. This assumes, however, that facility operators or fire officials would dispatch a firefighter inside a storage area to contain a fire (an internal response).

As explained in the enclosed letter from Captain Mark L. Haraway of the Wilmington Fire Department (Exhibit I), internal response is not practiced at bulk storage facilities. By definition, product in bulk storage is not containerized. A fire in any portion of the storage area would quickly consume all product, assuming the product were flammable. Fire officials respond externally to bulk storage facilities fires; they never send personnel through aisleways.

Further, as Chief Haraway explains, aisleways at bulk storage facilities are an attractive hazard. Though bulk storage operators have no occasion to send personnel inside storage areas and generally prohibit all internal access thereto, aisleways nonetheless invite pedestrian traffic, be it employee or trespasser. Any human activity involves risk of fire, and individuals present in bulk storage areas risk fire trap and product inhalation hazards.

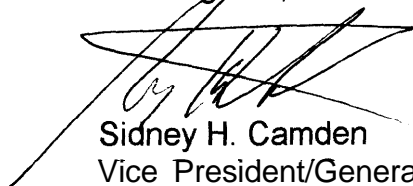
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Beyond posing a safety hazard, the application of **aisleway** requirement to dry bulk storage facilities imposes a financial burden on warehouse operators by limiting capacity utilization. For example, Almont's 40,000 square foot warehouse can store 28,500 short tons of product. The application of **aisleway** requirements to the warehouse reduces capacity to 5,850 short tons, a 21% utilization rate. This effect is further explained in Exhibits 2 and 3.

For these reasons, Almont supports the elimination of **aisleway** requirements to bulk storage facilities, as contemplated in the proposed rule.

Please contact me if you have any questions regarding this matter.

Best regards,

A handwritten signature in black ink, appearing to read 'S. H. Camden', is written over a horizontal line.

Sidney H. Camden
Vice President/General Manager

Enclosure

c: Ethan S. Naftalin (w/o enc.)
Charles D. Case (w/o enc.)
Mark L. Haraway (w/ enc.)

EXHIBIT 1



Post-it® Fax Note	7671	Date	11-30-77	# of pages	1
To	Randy Bennett	From	Chief E.E. Bentz		
Co/Dept	Almont Shipping	Co.	Wilm Fire Dept.		
Phone #		Phone #			
Fax #	763-9317	Fax #	763-9317		

CITY of WILMINGTON North Carolina

P.O. BOX 1810
28402

FIRE DEPARTMENT
TDD (910) 341 7873

To: Randy Bennett
Almont Shipping
cc: USCG

From : Capt. Mark L. Haraway

Dear Sir,

In 1997 I made an inspection of the Almont Shipping Complex by request of the management. I was specifically asked to look at the interior bulk storage of aggregate product in the large open warehouses. Since the buildings are loaded and unloaded automatically and no personnel are working in the product area the Wilmington Fire Dept. has no problem with the bulk storage.

As far as firefighting concerns we would not put a firefighter into one of the warehouses in a fire condition. We would make a defensive attack from the outside of the structure.

I feel having aiseways in the warehouses would simply offer a more dangerous setting in that it would invite workers to walk through the storage area where tons of product is stored. The manor in which it is stored now does not offer any hazards to workers because they can't walk through the area.

Capt. Mark L. Haraway

Chief E.E. Bentz

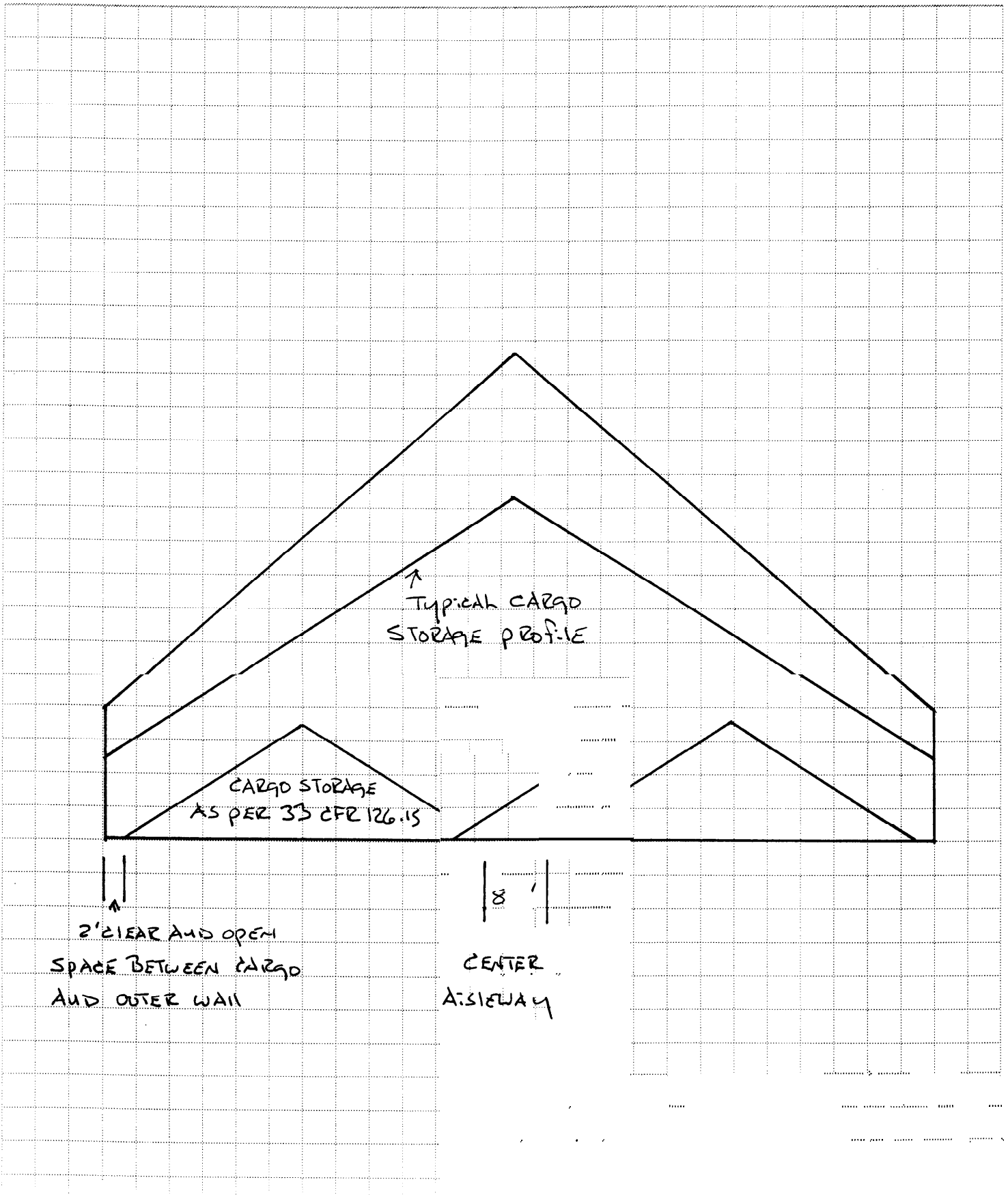
ALMONT SHIPPING TERMINALS

JOB DESCRIPTION: EXHIBIT 2



NAME: _____

DATE: _____



ALMONT SHIPPING TERMINALS

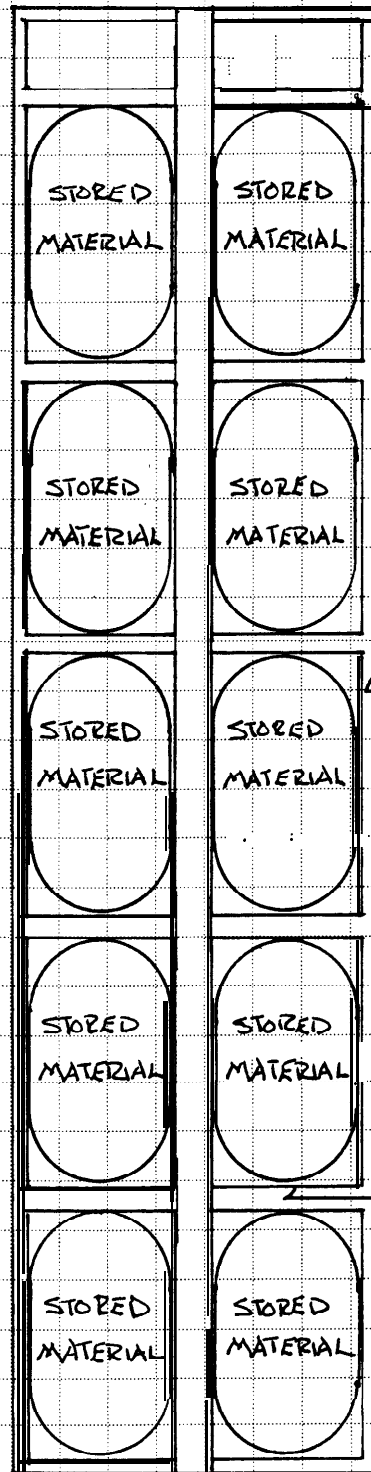
JOB DESCRIPTION: EXHIBIT 3



NAME: _____

DATE: _____

CARGO STORAGE ARRANGEMENT
AS PER 33CFR 126.15



10 piles of
14630 Q' OR
585 Tons of
80 lb product.

2' CLEAR AND OPEN SPACE
BETWEEN CARGO AND
OUTER WALLS

5' CROSS AISLES EVERY
75'

8' CENTER AISLEWAY